Message

From: Strynar, Mark [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A9910D5B38E471497BD875FD329A20A-STRYNAR, MARK]
Sent: 6/21/2017 5:48:09 PM
To: Hall, Renea [Hall.Renea@epa.gov]
CC: Libelo, Laurence [Libelo.Laurence@epa.gov]
Subject: RE: GenX clarification

See a couple of edits.

Mark

From: Hall, Renea
Sent: Wednesday, June 21, 2017 11:04 AM
To: Strynar, Mark <Strynar.Mark@epa.gov>
Cc: Libelo, Laurence <Libelo.Laurence@epa.gov>
Subject: RE: GenX clarification

Mark,

Thanks for your clarification. We are working on an briefing paper and Becky had concerns with the wording of what we had based on the TSCA Consent Order.

Two chemicals that are intended to replace PFOAs/PFOSs have been found in the Cape Fear River which is the source for the Wilmington, NC drinking water system

This is what I changed our language to:

Ex. 5 Deliberative Process (DP)

Please advise if you concur with my revision.

From: Strynar, Mark
Sent: Wednesday, June 21, 2017 9:00 AM
To: Hall, Renea <Hall.Renea@epa.gov>
Cc: Allenbach, Becky <Allenbach.Becky@epa.gov>; Medina-Vera, Myriam <Medina-Vera.Myriam@epa.gov>; Lindstrom, Andrew <Lindstrom.Andrew@epa.gov>
Subject: RE: GenX clarification

Renea,

I was out office yesterday on travel.

I will answer your questions below however you may get a different answer from Chemours/DuPont. See the attached highlighted brochure.

1. Per the DuPont brochure they appear to call the ammonium salt GenX. In water samples the salt form will dissociate into the anionic form as would the free acid. A mass spectrometer cannot tell them apart as they are the same analyte. Thus I would call both the salt form or the free acid form GenX. Some also call GenX HFPO-DA for the hexafluoropropyl oxide dimer acid (WV consent order).

2. GenX in our study would include both the salt form or the free acid form as they both exist as the anionic deprotonated or desalted acid in the water. Air emission analysis my gave a different answer if the GenX retains the ammonium salt. I am not sure on that.

3. I would say yes bot the salt and acid forms were analyzed in our study as they both go to a common chemical form in water. However, we cannot say which contributed to the measured GenX.
Mark

From: Hall, Renea
Sent: Tuesday, June 20, 2017 10:16 AM
To: Strynar, Mark <Strynar.Mark@epa.gov>
Cc: Allenbach, Becky <Allenbach.Becky@epa.gov>
Subject: GenX clarification

Mark,

I left you message, but wanted to follow-up with an email. We need your assistance to help us clarity how "GenX" is defined.

The TSCA sanitized version refers to 2 compounds.

III. CONTENTS OF PMN

Confidential Business Information Claims (Bracketed in the Preamble and Order): specific chemical identity, production volume, manufacturing process and sites, processing, use, and other information

Chemical Identities:

Specific: **P-08-508** [ ]

CAS no.: [ ] and **P-08-509** [ ] CAS no.: [ ].

Generic chemical identity: **P-08-508**–Perfluorinated aliphatic carboxylic acid and **P-08-509**–Perfluorinated Aliphatic Carboxylic Acid, Ammonium Salt

Based on your study, you stated:

- *One group of fluorinated alternatives, perfluoroalkyl ether carboxylic acids (PFECAs), was recently discovered in the Cape Fear River (CFR) downstream of a PFAS manufacturing facility….*
- *The ammonium salt of PFPrOPrA* is a known PFOA alternative that has been produced since 2010 with the trade name "GenX"….*
- perfluoro- 2-propoxypropanoic acid (PFPrOPrA)}

I have the following questions:

1. Based on your understanding of GenX, does the term "GenX" refer to the salt form OR to both the carboxylic acid and ammonium salt versions?
2. Is "GenX" in your study limited to the salt form?
3. Were both salt and acid forms sampled in your Cape Fear study?

Thanks for your assistance.

Renea Hall
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WaterSense Coordinator
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